

# **EXHIBIT 6**

## Shawn Fox

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**From:** Brown, David (Cardiology) <David.Brown@CARDIO.CHBOSTON.ORG>  
**Sent:** Wednesday, September 23, 2015 7:40 AM  
**To:** Shawn Fox; Daniel Olivo  
**Cc:** Rebecca King; Sean P. Tracey  
**Subject:** RE: Goulet v. Pfizer

Wow. OK. This required a lot of work to arrange!!! And I've done a fair amount of preparatory reading for tomorrow's deposition, reviewing her neonatal records, reading all the materials you sent me along with some other research (by the way I enjoyed Dr. Abdulla's thorough document). Pulled together a few diagrams to explain her condition and the surgery to fix it that I think would help a layperson.

Happy to talk by phone at our 3-4 time,  
Thanks  
David

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**From:** Shawn Fox [mailto:sfox@traceylawfirm.com]  
**Sent:** Tuesday, September 22, 2015 9:39 PM  
**To:** Brown, David (Cardiology); Daniel Olivo  
**Cc:** Rebecca King; Sean P. Tracey  
**Subject:** RE: Goulet v. Pfizer

Dr. Brown-

Some issues have arisen between the parties with regard to the case that will likely need court intervention. The matter will not be able to be resolved prior to your deposition which is scheduled Thursday morning at 8:00 a.m. Thus, the parties have agreed to adjourn your deposition until the issues can be resolved. I apologize for the late notice. We will, of course, compensate you for any inconvenience in having had to rearrange your schedule to accommodate the deposition. We appreciate your cooperation and understanding in this matter. We have a meeting scheduled for tomorrow between 3 p.m. and 4:00 EST. We would still like to use that time to discuss a few matters over the phone, instead of an in-person meeting, if this still meets your schedule. We will, likewise, compensate you for the hour of your time.

Again, I'm sorry for any inconvenience this has caused.

Shawn Fox  
Tracey & Fox

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**From:** Brown, David (Cardiology) [mailto:David.Brown@CARDIO.CHBOSTON.ORG]  
**Sent:** Monday, September 21, 2015 3:27 PM  
**To:** Daniel Olivo  
**Cc:** Shawn Fox; Rebecca King  
**Subject:** RE: Goulet v. Pfizer

Cell is 617-519-0630. Shawn we can talk by cell if you don't want to make the trip out to Dover  
Checking on schedule, right now it's at the Chickering School, 29 Cross Street, Dover MA 02030  
Thanks  
David

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**From:** Daniel Olivo [<mailto:dolivo@traceylawfirm.com>]  
**Sent:** Monday, September 21, 2015 4:02 PM  
**To:** Brown, David (Cardiology)  
**Cc:** Shawn Fox; Rebecca King  
**Subject:** RE: Goulet v. Pfizer

Greatly appreciated Dr. Brown. We will meet with you at the soccer field at 5:00 pm. Can you send me the physical address for the soccer field?

Additionally, may we have your cell phone number in case Mr. Fox needs call you once he arrives at the field? Shawn's cell phone number is 713-494-7799. Thanks.

**DANIEL OLIVO** | PARALEGAL

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**From:** Brown, David (Cardiology) [<mailto:David.Brown@CARDIO.CHBOSTON.ORG>]  
**Sent:** Monday, September 21, 2015 2:44 PM  
**To:** Daniel Olivo <[dolivo@traceylawfirm.com](mailto:dolivo@traceylawfirm.com)>  
**Subject:** RE: Goulet v. Pfizer

Working on this – Weds is really bad at the moment – unless you can come to my son's soccer practice 5-6:30? It's in Needham MA. I could also talk on the phone during that time,

Thanks  
David

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**From:** Daniel Olivo [<mailto:dolivo@traceylawfirm.com>]  
**Sent:** Monday, September 21, 2015 11:14 AM  
**To:** Brown, David (Cardiology)  
**Cc:** Shawn Fox; Rebecca King  
**Subject:** Goulet v. Pfizer

Dear Dr. Brown,

Are you available to meet with Mr. Shawn Fox and Mrs. Rebecca King this Wednesday, September 23<sup>rd</sup>? An hour or two would be great, if possible.

As a reminder, we have your deposition scheduled for this Thursday morning beginning at 8:00 am at the Conference Room, The Inn at Longwood, 342 Longwood Ave, Boston, MA 02115. Thanks.

**DANIEL OLIVO** | PARALEGAL

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